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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JANE JOYCE RICE; WATER GARDEN,
INC.; PERPETUAL LEGACY CORP.;
CARTE BLANCHE TRUST; &
NEWPORT TRUST CO., LTD.;

Defendants.

Docket No. 07-CV-019-B

**MOTION TO ADMIT TED H. MERRIAM &
KEVIN A. PLANEGGER *PRO HAC VICE***

The law firm of Thomas R. French, P.C., pursuant to U.S.D.C.L.R. 83.12.2(b), respectfully submits the following Motion to Admit Ted H. Merriam and Kevin A. Planegger of Merriam Law Firm, P.C., *Pro Hac Vice*, to represent Jane Joyce Rice, Water Garden, Inc., Perpetual Legacy Corp., Carte Blanche Trust and Newport Trust Co., Ltd. In support of this motion, Thomas R. French, P.C. states as follows:

1. Thomas R. French is a member in good standing of the Bar of the State of Wyoming and the bar of this Court. Mr. French has been a member of the Bar of the State of Wyoming since 1990, and a member of the Bar of this Court since 1997.
2. Mr. Ted H. Merriam has been a member of the Bar of the State of Colorado for more than 31 years. Mr. Kevin A. Planegger has been a member of the Bar of the State of Colorado for more than 12 years.
3. Mr. French knows Mr. Merriam and Mr. Planegger, and vouches for their good moral character and veracity.
4. Mr. French shall be fully prepared to represent Mr. Merriam and Mr. Planegger in this case at any time and in any capacity.
5. Mr. Merriam and Mr. Planegger understand the requirements for *pro hac vice* counsel under U.S.D.C.L.R. 83.12.2(b), and agree to abide by all of those requirements, and the other Local Rules of the United States District Court for the District of Wyoming.
6. Mr. Merriam and Mr. Planegger understand and agree that they are subject to disciplinary jurisdiction of this Court for any alleged misconduct arising in the course of preparation and representation in this case.

WHEREFORE, based upon the foregoing, Thomas R. French respectfully requests that this Court allow Ted H. Merriam and Kevin A. Planegger of Merriam Law Firm, P.C. to practice before this Court in this case, *pro hac vice*.

Respectfully submitted this 3rd day of February, 2010.

THOMAS R. FRENCH, P.C.

By: /s/
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Attorney for Jane Joyce Rice, Water Garden,
Inc., Perpetual Legacy Corp., Carte Blanche
Trust, and Newport Pacific Trust Co., Ltd.

Certificate of Service

This document has been electronically filed in this Court this 3RD day of February, 2010, in compliance with the requirements for ECF in the United States District Court for the District of Wyoming, and service has been effected pursuant to that ECF filing.

/s/ _____

Thomas R. French